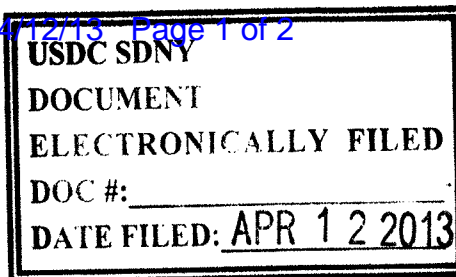


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April 11, 2013

VIA E-MAIL

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Brown, et al. v. City of New York, et al., No. 11-CV-1068

Dear Judge Nathan:

The parties in the above-referenced case jointly request an extension of time with respect to three upcoming deadlines. First, Plaintiffs request the time to file their motion *in limine* be extended to Monday, April 15, 2013. The original due date was April 8, 2013. On April 8, 2013, Plaintiffs requested, and were granted, an extension of time to file the motion *in limine* by April 12, 2013. Undersigned counsel for Defendants does not oppose Plaintiffs' request to extend the due date for their motion *in limine* to April 15, 2013.

Second, the parties request that response times for each party to file oppositions to motions *in limine* filed by Defendants on April 8, 2013 and to be filed by Plaintiffs on April 15, 2013 be extended to April 22, 2013. The current due dates for the oppositions are April 15, 2013 for Plaintiffs and April 19, 2013 for Defendants.¹ Neither party has previously requested an extension of time to file their opposition to a motion *in limine*, and counsel for all parties consent to the extension.

Third, Defendants request an extension of time to file the reply memorandum to Defendants' motion to exclude the proffered testimony of Plaintiffs' expert witness, Marcia Knight (the "Motion"). The reply memorandum was originally due April 10, 2013. On April 9, 2013, Defendants requested, and Your Honor granted, an extension to April 12, 2013 to file the reply to the Motion. Today, Defendants learned that the client representative from the City of

¹ This reflects the fact that Defendants filed their motion *in limine* on April 8, 2013 with the pretrial order, while Plaintiffs were granted an extension to April 12, 2013 to file their motion *in limine*.

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New York is at the hospital in connection with the birth of his child, which will prevent counsel for Defendants from finalizing and filing the reply by the deadline tomorrow. As such, the parties jointly request that Your Honor extend the deadline for submitting Defendants' reply in connection with the Motion to April 22, 2013.

In sum, the parties respectfully request that the Court enter an order as follows: that (1) Plaintiffs' motions *in limine* is due on April 15, 2013; (2) Plaintiffs' opposition to Defendants' motions *in limine* is due on April 22, 2013; (3) Defendants' opposition to Plaintiffs' motions *in limine* is due on April 22, 2013; and (4) Defendants' reply in connection with Defendants' motion to exclude the proffered testimony of Plaintiffs' expert witness, Marcia Knight is due on April 22, 2013.

Thank you for your attention to this matter.

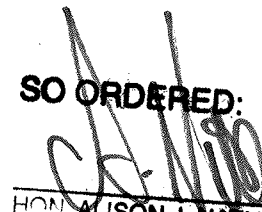
Respectfully submitted,



Martin S. Bloor

cc: Eugene Bellin, Esq. (by E-mail)
Steven D. Michelstein, Esq. (by E-mail)
Arthur Blitz, Esq. (by E-mail)

SO ORDERED:


HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

4/12/13

SO
ORDERED.
NO
further
extensions
absent truly
exceptional
circumstances.